VERIZON RESPONSE TO VA SCC KPMG EXCEPTION

Exception #: 6

Component: KPMG Consulting received late Telephone Number Availability &

Reservation (TNA)¹ pre-order responses submitted via the Electronic

Data Interface (EDI).

Domain: Metrics

Date Uncovered by KPMG:

11/19/01, 12/19/01 (version 2)

Date VERIZON 11/19/01, 12/19/01 (version 2) **Received:**

Date VERIZON

Responded:

11/29/01; 01/04/02 (version 2)

KPMG Summary Statement and Late pre-order responses prevent CLECs from obtaining the information necessary to efficiently process customer service requests on a timely basis.

VERIZON Response: 1/04/02 Clarification to Verizon Response

As outlined below, The VA Metrics Collaborative has reached consensus to adopt language from NY that allows the TN Availability and Reservation and Address Validation transactions to be combined for the Retailmeasurement definition. Verizon has performed additional analysis of the TN Availability and Reservation response times for KPMG Consulting's Volume Performance Testing. This analysis revealed an abnormal distribution of test transactions. The majority of KPMG's TN Availability and Reservation requests were within the same Central Office range, allowing for a disproportionate number of transactions accessing data in the same area of the database. While transactions were processed successfully, this situation did cause a minor degradation in performance. KPMG's Volume Performance Test represented forecasted Order and Pre-order volumes across the Virginia, Maryland, West Virginia, and DC jurisdictions. However, the transactions used to simulate this forecast were submitted against only VA accounts, in a limited number of Central Offices. This condition does not represent actual production activity that would be distributed across the four jurisdictions.

11/29/01 Response to Exception

The existing transaction for Wholesale is a combination of TN Availability and Reservation and Address Validation and cannot be measured separately from Address Validation. The Retail transaction is only TN Availability and Reservation. Therefore, the transactions are not comparable.

The Va. Metrics Collaborative has reached consensus to adopt language

¹ TNA - Telephone Number Availability & Reservation is formerly known as Telephone Number Selection (TNS).

from NY that allows these transactions to be combined for Retail and is worded as follows: "While Address Validation can be completed on a standalone basis, Telephone Number reservation is always combined with Address Validation. For VZ retail representatives this is a required two step process requiring two separate transactions". When the Va. SCC orders updated Carrier Guidelines, this issue will be resolved.